SECOND TECHNICAL REVIEW
NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Western Utah Copper Company
Maria Mine

M/001/059

Please address only those items that are italicized AND bolded

R647-4-104 - Operator's, Surface and Mineral Ownership

1. Please provide, "The name, permanent mailing address, and telephone number of the operator responsible for the mining operations and reclamation of the site."

2. Please provide, "The name, permanent mailing address, and telephone number of the surface landowner(s) and mineral owners(s) of all land to be affected by the operations."

3. Please provide, " The federal mining claim number(s), lease number(s), or permit number(s) of any mining claims, or federal or state leases or permits included in the lands affected." (TM)

R647-4-105 - Maps, Drawings & Photographs

105.1 Topographic base map, boundaries, pre-act disturbance
The plan states that the entire disturbance at this site will not exceed 7 acres. The reclamation plan indicates 10.62 acres of disturbance that does not include disturbances attributed to the development of a water well that will service the site, the disturbance for the water line placement, and the road to the well. Please correct this discrepancy. (DJ)

The plan has been changed to include the additional disturbances. This will satisfy the Division's concerns in this area. (DJ)

The introduction to the plan states that a bond for disturbances associated with the exploration, equal to three acres of disturbance, is presently in place. What is the surety amount and who is presently holding this bond? (DJ)

I misread the statement relating to the proposed blanket bond for exploration outside the Maria mine area. This is not a bond that is presently in place. I apologize for any confusion my inquiry may have caused. (DJ)

The Division agrees that the TCLP tests run on the old mill tailings indicate that the tailings tested do not show a problem with migration of metals contained within that sample. However, we are concerned that this sample starts at a pH of 4.94 with a final pH of 4.81. The plan states that the material scheduled to be milled will contain sufficient calcium chloride to keep the tailings pH elevated. Please explain the low pH value shown on the test data sheet. (DJ)

I agree the pH reflected on the TCLP tests was actually an artificial level set for precipitation that may fall on the site.

The question concerning calcium chloride should have read calcium carbonate; again I apologize for this oversight in checking my comments. (DJ)

TCLP tests are utilized to predict heavy metal mobility from dump material using pH adjusted solutions. This test is not used to predict the acid potential of material. An Acid Based Accounting procedure (Sobek Test) or a Net Acid Generation test (NAG) should be run to predict this eventuality. (DJ)

105.1.14

Please identify, "Known areas which have been previously impacted by mining or exploration activities within the proposed area."

These areas have been identified on a Mine Project Disturbance Map included with the response to the Division's initial review. This satisfies the Division's concern in this area. (DJ)

105.2 Surface facilities map

The plan presently does not include any storage facilities for the fuels required for operating the site. Please indicate the location and type of fuel storage facility proposed and include plans for secondary containment and clean up of spills. (DJ)

WUC's response states no fuels will be stored on site. The BLM EA states that fuels would be stored on site; this was the basis for this inquiry. WUC's comments satisfies the Division's concerns in this area. (DJ)

The location of the generators is not shown on the site map. Please show where these facilities will be placed. Please indicate whether these generators will be placed on cement, in a building, or trailer mounted. (DJ)

WUC's response states that generators will be trailer mounted and located up to ½ mile from the site. Please indicate this <u>possible</u> location on the facilities map and indicate that the location is a proposed location, the actual location to be noted at the time of placement. (DJ)

Will there be a power corridor from the generator location to the Millsite? If so, this additional disturbance should be included in the affected area at the site. (DJ)

Will this site contain a service and repair facility for the mobile machinery that will be operated on the site? If so, where will this facility be located? (DJ)

No service or repair facilities will be located on site. This response satisfies the Division's concerns in this area. (DJ)

Will the tailings storage area be sloped to allow for fluid recovery from the tailings? (DJ)

The response states that tailings will be dried before placement. This response satisfies the Division's concerns.(DJ)

The location and material used to construct the sub-station should be shown on the facilities map. The plan states that the location of the substation cannot be shown until talks with a commercial power company are completed. However, the plan also states that generator power will be wired into a central substation. Commercial power would likely be routed to this same substation. Therefore, this facility should be shown on the surface facility map and the removal included in the bond calculations. (DJ)

The Division agrees that this is a "tiny" (your words) issue, we are attempting to complete this plan so that WUC will not find it necessary to continue to write amendments to their approved plan for each additional small change to the operation. WUC can choose to make incremental changes to their plan, but each of these changes has the potential to cause operational delays if problems are found with any of the submittals. (DJ)

The plan states that the well site (or sites) will contain a pump, fuel tank and a generator. Please include a plan view indicating the size of the area to be impacted by this facility. Reclamation costs for these areas, as well as for the roads built to access these areas, should be included in the bond. (DJ)

The BLM EA states "water from the well would be conveyed to the mill facility via a buried plastic piping." WUC's response states that at least two of the sites could have water lines run down the bar ditch of the county road. Please state which option will be used when placing the water lines to the mill. If the water lines are to be buried and roads built to access these sites, please include the additional disturbances in the total affected areas of the permit.

WUC's response states "The State and BLM will plan to get water from the well and will have an interest in the well." Please include letters from these agencies with the plan in order to release WUC from reclamation liability of these features. If WUC is unable to obtain these letters, the cost of reclamation of the wells and access roads should be included in the surety. (DJ)

The placement of the septic tank and leach field should be shown on the surface facilities map. (DJ)

Actual location will be shown on a map when approved by the Health Department. This response satisfies the Division's concerns. (DJ)

The plan states that an office building will be built on the site after the mill building is constructed. Please indicate the size and construction details for this building. The demolition and removal of this building should be included in the bond calculations. (DJ)

There are no plans to build the office in the immediate future. This feature will be included in the plan when it becomes necessary. This answer satisfies the Division's concerns. (DJ)

Maps 3, 4 & 5 show the existence of a fresh water pond and additional storage area, but these items are not discussed in the plan. Please include the design, construction and reclamation plans for these two facilities. (DJ)

WUC's response states that the water storage pond is earthen in nature, but the BLM EA states that the pond will be lined with a plastic liner. Please indicate, which of these statements is correct. (DJ)

Map 3 indicates the construction site is 300'x 500' (150,000 sq ft). The actual site, as shown on the map, is larger. Please indicate the correct figure. (DJ)

WUC's response satisfies the Division's concerns. (DJ)

The reclamation plan notes 8,000 sq ft of access road that will need to be reclaimed. Please show this road on the surface facilities and reclamation treatments maps. (DJ)

Maps included with WUC's response notes that these roads to the facilities will be reclaimed. This satisfies the Division's concerns in this area. (DJ)

R647-4-106 - Operation Plan

106.2 Type of operations conducted, mining method, processing etc.

The plan states that the mill will eventually be capable of processing 2,500 tons/day with minor modification. Will these modifications to the mill change the facilities as presently proposed? (DJ)

No modifications will be required to expand the operation to 2500 tons/day. This response satisfies the Division's concerns on this matter. (DJ)

106.3 Nature of materials mined, waste and estimated tonnages

The plan states that material from other sites may be milled at this site at a later date. What are the metallurgic properties of these alternate materials and will they be similar to the ore material presently proposed to be processed at this mill? (DJ)

WUC's response to this inquiry satisfies the Division's concerns on this matter. (DJ)

106.5 Existing soil types, location, amount

The application contains no baseline information about soils. The Division needs a description of existing soil types, including the location and extent of topsoil or suitable plant growth material. While it is understood that much of the site is previously disturbed, much of it is not, and the application needs information on which to base the reclamation plan. (PBB)

The response letter says there is no topsoil anywhere in the Rocky Range. Whether this is correct or not, the operator needs to identify soils in the area. This regulation says the operator must identify the location and extent of topsoil or suitable plant growth material, not just topsoil. Portions of the application indicate alluvial or colluvial material will be harvested from areas near the Hidden Treasure Mine, but the areas from which this soil will be taken need to be identified together with the extent of soil salvage from these areas. (PBB)

The September 3, 2002, letter from the operator says they intend to salvage the first six inches of material (assumed to be from the mill site area), and this will amount to about 3300 cubic yards. Based on this information, the area from which soil would be salvaged is about 4 acres; however, the disturbed area near the mill would be 5.72 acres according to information in the proposal the Division received June 5, 2002. This apparent discrepancy needs to be resolved and the information included in the plan. (PBB)

The application received June 5, 2002, says that in reclamation, the excavation for the pad will be sloped and contoured after 12 to 18 inches of growth medium has been placed on it. The operator needs to clarify this commitment. Combining this statement with the statement in the response letter, it appears the operator intends to salvage and replace six inches of soil from the area of the mill and supplement this with six to twelve inches of soil from the "alluvium waste piles from stripping" as shown on the Mine Project Disturbance Map received by the Division September 3, 2002. The operator needs to provide a clear statement <u>as part of the plan</u> showing what soil salvage and replacement is intended. In addition, the site should be sloped and contoured before the growth medium is replaced, not after. (PBB)

Drawing three shows an area where the operator would dispose of waste rock from the mine shaft sinking. The operator needs to supply information about the chemical and physical nature of this waste rock material and whether 12 to 18 inches of soil cover would be adequate for reestablishing vegetation. Plant roots normally extend well beyond 12 to 18 inches, so the Division needs to know whether the waste rock has characteristics that would limit rooting depth and plant growth. (PBB)

Page 1 of the application the Division received June 5, 2002, says, "The pad has been designed with at least a ten foot cut so that ample elevation will be available to bury the footings with more than 3 feet of material and still be the original elevation before construction." Assuming the pad is 3.9 acres as shown in this submittal, there would be about 63,000 cubic yards of material taken from this area, but the application does

not show where this material will be stored. It also appears there might be excess material following reclamation, and the application does not discuss reclamation of this material. (PBB)

The application says in Section 2.2, "The entire area that WUCC proposes to work in has suffered tremendous disturbance from past operators and very little if any virgin ground can be discovered at or near the proposed site." This statement needs to be modified. Most of the area around the proposed mill building is undisturbed. (PBB)

The operator responded to this comment by stating that little or no virgin ground exists. As stated in the original review, most of the area around the proposed mill building is undisturbed. The Division has photographs of this area in which it is impossible to see signs of disturbance. The area has cryptogamic soils, and in this type of environment, cryptogamic soils commonly take 50 or more years to develop. The Division considers this good evidence of the lack of disturbance. Please modify the application accordingly. (PBB)

106.6 Plan for protecting & redepositing soils

The application contains no information about how much soil is available or about the quality of the soil material in the area. There is limited information about storing and depositing soils. A response letter to the Bureau of Land Management (BLM) behind the tab "Amendments to Plan of Operations" says soil will be stockpiled south of the Hidden Treasure waste dump piles. "Sheet four" in the maps section shows locations of three proposed topsoil stockpile areas, and by using the information in the letter to the BLM, one can deduce which location is to be used. The map should be revised to clearly show only the area that will be used. (PBB)

Drawing Three shows a topsoil pile south of the Hidden Treasure waste dump pile. The operator has satisfied this requirement. (PBB)

The application does not show what or how much topsoil will be salvaged and stored in this stockpile area. The plan must describe/show how much soil will be taken from which areas. The operator also needs to consider whether the topsoil storage area has enough room for the soil to be stored there. (PBB)

The operator responded that about six inches of material amounting to 3300 cubic yards will be salvaged and that there is ample room for this much soil. The operator has adequately responded to this specific deficiency. (PBB)

In the letter to the BLM, the operator commits to mix vegetation with the topsoil then seed the piles (are there more than one?) to stop noxious weed advancement. Because establishing vegetation can be difficult in an arid environment, the Division recommends that the operator monitor the vegetation, and it may be necessary to perform remedial measures if erosion or noxious weeds become problems. (PBB)

Section 2.3.5 discusses reclamation of the tailings. According to this section, overburden and topsoil from the existing spoil piles of the original Hidden Treasure stripping operation would be used to cover the tailings six inches deep; however, the reclamation plan section of the application says the tailings impoundment will be covered with 12 to 18 inches of growth medium. This discrepancy needs to be resolved. The Division does not consider six inches to be adequate soil cover. It appears there is ample soil available in the area for a deeper coverage. (PBB)

The operator responded that Section 2.3.5 was eliminated by the "AMENDMENTS TO PLAN OF OPERATIONS." Although the Division would be satisfied with this response, Section 2.3.5 needs to be resubmitted with appropriate modifications. The current application contains a section detailing which particular portions of Section 2.3.5 should be taken out and left in the plan, but this is confusing. Other portions of the application have been submitted in the form of several letters and revised plans making it very difficult to follow. The operator needs to eliminate those portions of the plan that are no longer needed, such as portions of Section 2.3.5, and consolidate the entire plan into one clear, concise plan that addresses each regulation. Properly referenced supplemental material could be included, but the Division has found it very difficult to review the plan as submitted and will not be able to approve it in this form. Until these changes are made, the Division will review the application with the understanding that 12 to 18 inches of colluvium or alluvium will be placed over the tailings. (PBB)

Twelve to 18 inches of soil may be adequate cover for the tailings, but if the pH of the tailings is low or if some other chemical or physical characteristic is unfavorable for plant growth, some changes to the reclamation plan might be needed. At this time, the Division does not have adequate information to approve this plan. More details of the requirements for testing the tailings are discussed below. (PBB)

Since the Division has no information about the nature of the material that would be used to cover the tailings, it is impossible to judge whether the material is suitable as a growth medium. It should be tested for: pH, acid/base potential, texture (including coarse fragments), water holding capacity, sodium adsorption ratio (SAR), exchangeable sodium percentage, electrical conductivity, and organic matter content. (PBB)

The operator responded that the Division's questions about the growth medium's suitability are unreasonable and that the tests are expensive and time-consuming. The Division's concern was that soils in this area sometimes have horizons that could limit plant growth, such as sodic horizons or cemented hard pans. Upon further consideration, however, the Division realized that the soils in the tailings area are probably entisols with little horizon development and that it is unlikely these soils have chemistry problems. Are there areas, though, where other materials, such as some of the bedrock, may have been mixed with this soil making these soils less desirable? Should some of these areas be avoided? The operator needs to identify on a map those

specific areas from which the soil would come, indicate the depth of salvage, and discuss the reclamation plan for these areas. (PBB)

The analyses of the tailings show no limiting factors except the pH, but there are other parameters for which the tailings should be tested, such as SAR, electrical conductivity, and texture. While the pH is not extremely low, it is much lower than plants in the area are adapted to and would probably limit plant growth if only six inches of soil was placed over it. Eighteen inches of soil cover may be adequate. (PBB)

The tailings sample used is old material and may not be representative of the tailings that will be produced in the proposed operation. Chemistry of these types of materials is known to change with time. For this reason, it is important that the operator include a commitment to periodically test the actual tailings produced as part of the future mining. If the operator does any kind of pilot-test on the processing equipment, the tailings from this test should be analyzed to obtain results as far as possible in advance of actually beginning operations. It may be necessary to modify the reclamation plan based on these results. (PBB)

The operator committed in the response letter to conduct periodic tests on the tailings. The operator believes the calcium carbonate will act as a neutralizer and that the results will probably not vary much from what is already known. The application also contains discussion about why there should be no acid generation. (PBB)

The general statements in the application about the anticipated nature of the waste material need supporting data. To affirm the statements in the application about the chemistry of the tailings and the waste rock, please show on a map the locations of some of the drill holes in the proposed mining area. For these core samples, please include laboratory data showing the chemical nature of these materials. (PBB)

The application indicates that no sulfide deposits were ever found during core drilling, but the portion of Section 2.3.5 that was eliminated said the overall mineral suite dictated by past production demonstrates that the ore has a ratio of 75% oxide and 25% sulfide. These statements are contradictory, and although the latter statement has been eliminated, the Division needs to know if it was eliminated because it is inaccurate or for some other reason. It brings into question the broad statement that there are no sulfides. (PBB)

The application includes portions of a publication entitled "Geology, Ore Deposits and Mineralogy of the Rocky Range, Utah." The portion of this publication included in the application says that pyrite is rare in the Rocky Range, but it has been found. The operator needs to present evidence showing whether it exists at this site. (PBB)

If the operator cannot produce the evidence required, it will be necessary to assume the tailings and waste rock could have acid-forming materials. In this case, it might be

necessary to cover these materials with additional soil material, possibly as much as four feet. (PBB)

The reclamation plan says three feet of growth medium will be used to cover the shaft and that 12 to 18 inches of growth medium will be placed over the pad area and the fresh water pond, but it needs to indicate from where this material will be obtained and what its quality is. The Division is concerned whether this much soil would be available in the proposed disturbed area because soils in the area may have sodic or calcic horizons that could limit plant growth if mixed with upper soil horizons. (PBB)

The operator's response letter says the operator plans to use material stripped from the Hidden Treasure Mine in 1969-1970; however, the response letter also indicates six inches of soil would be salvaged from the mill site area. As discussed above, this issue needs to be clarified, and the application needs to show what areas would be disturbed for topsoil. (PBB)

Information about the soil in the area of the proposed mill site is probably available in the form of a soil survey from the Natural Resources Conservation Service. This survey should give, in general terms, information about how much soil could be salvaged. (PBB)

The reclamation plan indicates that the access road will be ripped and seeded. If the road is only ripped, there are likely to be erosion problems as water follows the rips. It would be better to gouge the road irregularly and about two feet deep with a trackhoe or similar piece of equipment. (PBB)

The operator agreed to this recommendation. The commitment needs to be included in the mine plan. (PBB)

106.7 Existing vegetation - species and amount

The application contains no information about vegetation currently existing on the site or in adjacent areas. The rules require the application to contain a description of existing vegetative communities and cover levels sufficient to establish revegetation success standards. (PBB)

The operator's response letter says the only vegetation existing on the site is sparse stands of rabbitbrush and sagebrush, and it refers to information already supplied by the BLM. (PBB)

The information in the application and from the BLM does not satisfy the requirements of this regulation. As mentioned in the original review, the rules require the application to contain a description of existing vegetative communities and cover levels sufficient to establish revegetation success standards. The only vegetation information from the BLM that the Division could find is in the environmental assessment (EA). The EA says the existing vegetation is predominantly Wyoming big sagebrush, Indian

ricegrass, and galleta. This does not give cover levels sufficient to establish revegetation success standards. (PBB)

R647-4-107 - Operation Practices

107.1 Public safety & welfare

A copy of the Air Quality permit should be included with the application or a letter stating that a permit will not be required. (DJ)

Please include a letter in the plan from Air Quality stating that a permit will not be required for this facility. (DJ)

Posting warning signs

Signs should be placed on the road to the facility warning the public of the existence of the facility and any associated hazards. (DJ)

WUC's response agrees to post of warning signs, this satisfies the Division's concern in this area. (DJ)

107.4 Deleterious material safety stored or removed

The plan states that oil will be handled in accordance with the MSHA regulations, which are less stringent. Please include a copy of these regulations for the Division's review and approval. (DJ)

WUC's statement concerning MSHA regulations on page 8 of their Plan received on April 17, 2002 should be changed to reflect the statement made in their latest response. (DJ)

107.5 Suitable soils removed & stored

This is addressed under regulation 106.6 above. (PBB)

107.6 Concurrent reclamation

The application does not describe how reclamation will be conducted concurrently with the mining operations. Since this is an underground operation with various surface facilities, concurrent reclamation may be difficult or impossible, but the applicant needs to at least address the issue and identify any areas where concurrent reclamation might be feasible. (PBB)

The response letter says it would be self-defeating and nearly impossible to perform concurrent reclamation on this project. The operator should address this regulation in this manner in the application. (PBB)

R647-4-109 - Impact Assessment

109.2 Impacts to threatened & endangered wildlife/habitat

The application does not address whether there would be any effects on threatened or endangered species. The Division is aware of three listed threatened or endangered species that may occur in Beaver County. These are the California condor, bald eagle, and the Utah prairie dog. Of these, the only one that might be adversely affected is the prairie dog. Information in a publication from the U. S. Fish and Wildlife Service and other agencies and groups shows historical range of the Utah prairie dog in the southern part of Beaver County and not in the mine area. The BLM is working on an environmental assessment that should address the possibility of threatened and endangered species in the area. Information from this assessment about the Utah prairie dog needs to be included in the application. Any other pertinent information about threatened or endangered species should also be included. (PBB)

The operator did not respond directly to this comment but did include a copy of the EA. Although the Division considers the information in the EA to be adequate, the EA needs to be incorporated into the plan, probably as an appendix or addendum. (PBB)

The BLM only considered the occurrence of one threatened or endangered species, the bald eagle. Bald eagles are uncommon to rare winter residents of the area but may occasionally pass through the Milford area while hunting. The BLM and the Division do not believe the mine would have any adverse effects on this species. (PBB)

109.3 Impacts on existing soils resources

At this time, the potential impacts to soil resources are not known because the application does not include baseline information about soils. After the operator includes this information and addresses comments about soil salvage and replacement, the operator and Division will be able to determine what effects the operation will have on soils. (PBB)

This comment still applies. The application does not contain adequate baseline information or detail of the operation and reclamation plans to assess what effects there will be on soils resources. (PBB)

R647-4-110 - Reclamation Plan

110.1 Current & post mining land use

The application needs to discuss the current and postmining land uses. (PBB)

The response letter says the current land use is suitable only for mining type of operations and that the lack of vegetation, water, and wildlife limit most uses. (PBB)

The Division recommends that the operator reference the land use information in the EA to address this regulation. According to the EA, the current land uses are predominantly mineral exploration, rockhounding, and seasonal livestock grazing. The Division suggests that wildlife habitat is probably another land use. (PBB)

Mining cannot be a postmining land use. The Division presumes the land will be returned to the premining uses, but the application needs to address this issue. (PBB)

110.3 Description of facilities to be left (post mining use)
The application indicates the access road will be reclaimed, but a letter from the operator behind the tab "Amendments to Plan of Operations" indicates some of the roads are public roads. The operator needs to specify what roads are public and what roads will be reclaimed. (PBB)

The operator's response references a letter and three maps in the original application. These maps show county roads in the area. The operator also submitted Drawing Three in which two access roads are highlighted with a comment "to be reclaimed." These responses satisfy the Division's concerns. (PBB)

110.4 Description or treatment/disposition of deleterious or acid forming material
Reclamation of the tailings pond is discussed in Section 106.6 of this review. (PBB)

110.5 Revegetation planting program
In the reclamation plan section of the application, the operator commits to seed various areas, but there are no plans showing how this will be done. The application needs to specify the seed mix and the quantities of seed in terms of pure live seed per acre. Once the operator supplies baseline vegetation information, the Division could recommend a seed mix. The reclamation plan should also show surface preparation methods, seeding methods and any special treatments, such as mulching, irrigation, or fertilizer or organic matter additions. (PBB)

The response letter says the operator is under the impression that the BLM has already imposed these requirements and provided them to the Division. The only requirement the Division is aware of is a statement in the EA saying the final seed mix to be used on disturbed areas will be determined by the authorized officer. This seed mix, together with other details of the reclamation plan, need to be included in the application. (PBB)

R647-4-111 - Reclamation Practices

111.5 Land capable of post mining land use
It is not known whether the land would be capable of supporting the postmining land use, because the plan does not give enough detail of the reclamation plan and because the operator has not specified the postmining land use. (PBB)

The operator did not respond directly to this comment, but the comment still applies. Once the application adequately addresses the postmining land use and reclamation requirements, it will be possible to judge whether the land is capable of supporting the postmining land use. (PBB)

R647-4-112 – Variance

The application needs to state whether the applicant requests any variances. (PBB)

The applicant's response letter says, "For what. Not familiar with this." The Division assumes the applicant is not requesting any variances. (PBB)

R647-4-113 – Surety

Please include a reclamation surety estimate with your response to this review. A blank copy of the Division's surety estimate is attached for your use. ***(DJ)***

Additional items that will also need to be included in the Maria Mine surety amount and also placed in the text of the plan:

Thickness and amount of reinforcement in building floors at the site.

WUC's response is satisfactory. (DJ)

Number, size and amount of reinforcement in concrete footings that will be higher than 3 feet.

WUC's response is satisfactory. (DJ)

Cost to reclaim the office building.

WUC's response is satisfactory. (DJ)

Cost to reclaim water well pad, road to the well(s) and cost to plug well(s) at closure.

Please refer to R105.2 – comment #6. (DJ)

Reseeding cost for water line, should the initial seeding fail.

Cost of seeding or reseeding an access road should include cost of gouging with a trackhoe to remove compaction before seeding. (DJ)

Cost of designing and installing the bulkhead in the Maria Shaft.

Please enclose a certified bid from Western Mine Development with surety calculation to validate any bids submitted with the plan. (DJ)

Cost to reclaim maintenance and generator facilities, if these items will be constructed.

No facilities of this type will be built, this response satisfies the Division's concerns. (DJ)

Reclamation of the sub-station.

A cost of $500 to remove this feature is noted in WUC's response, This amount will be sufficient if the substation is built as described in your latest response (two transformers which are 3x6x6 on a cement floor) This response satisfies the Division's concern. (DJ)

If commercial power is brought to the site, the cost of removal of the power line.

WUC's response states that removal of the power line is between the State and the power company. If Utah Power assumes the responsibility for the powerline removal, this item it will not be necessary to include the removal in the final reclamation calculations. A letter from the power company releasing WUC from this responsibility will need to be included with the plan or the cost of removal included in the reclamation costs. (DJ)

The State does not assume responsibility for any support features constructed to facilitate this mine. (DJ)

Any other changes in the plan that result from this review.

This item was included to note any additional items, such as access road reclamation, that would need to be included in WUC's reclamation bond calculations. (DJ)

Attachment: blank surety estimate

RECLAMATION SURETY ESTIMATE

mine operator — last revision **10/07/02**

mine name — filename M000-000.WB2 — page "estimate D8"

DOGM file Number — County

Prepared by Utah State Division of Oil, Gas & Mining

Note: actual unit costs may vary according to site conditions — last unit cost update 10/07/02

-Amount of disturbed area which will receive reclamation treatments = acres

-Estimated total disturbed area for this mine = acres

Activity	Quantity	Units	$/unit	$	Note
Safety gates, signs, etc. (mtls & installation)	0	sum	200	0	(1)
Demolitions of buildings and facilities	0	cf	0.26	0	(2)
Debris & equipment removal - trucking	0	trips	55	0	(3)
Debris & equipment removal - dump fees	0	ton	60	0	(4)
Debris & equipment removal - loading trucks w/FE loader	0	hours	180	0	(5)
Demolition & debris removal - general labor	0	hours	15	0	(6)
Regrading facilities areas (2 ft depth)	0	acre	613	0	(7)
Regrading waste dump slopes	0	CY	0.6	0	(8)
Ripping waste dump tops	0	acre	246	0	(9)
Ripping stockpile & compacted areas	0	acre	246	0	(9)
Ripping pit floors	0	acre	246	0	(9)
Ripping pit access roads	0	acre	613	0	(9)
Creating safety berms or barriers around highwalls	0	LF	0.2	0	(10)
Ripping access roads - dozer	0	acre	246	0	(9)
Regrading access roads - dozer	0	acre	246	0	(9)
Sidecast mtl replacement on steep roads - trackhoe	0	LF	1.25	0	(11)
Surface drainage restoration or construction	0	LF	0.2	0	(10)
Topsoil replacement - dozer	0	CY	0.58	0	(12)
Topsoil replacement - scraper	0	CY	1.19	0	(13)
Topsoil replacement - truck & FE loader	0	CY	2.65	0	(14)
Mulching (2 ton/acre alfalfa/straw)	0	acre	350	0	(00)
Fertilizing (100 lb/acre diammonium phosphate)	0	acre	90	0	(00)
Composted manure (10 ton/acre)	0	acre	300	0	(00)
Broadcast seeding	0	acre	240	0	(00)
Drill seeding	0	acre	240	0	(00)
Hydroseeding	0	acre	800	0	(00)
General site cleanup & trash removal	0	acre	50	0	(00)
Equipment mobilization	0	equip	2000	0	(00)
Reclamation supervision	0	days	400	0	(15)
		Subtotal		0	
10% Contingency				0	
		Subtotal		0	
Escalate for 5 years at 2.82% per year				0	
		Total		0	
		Rounded surety amount in year 2007 $		0	
Average cost per disturber acre =	#DIV/0!				